



DEPARTMENT OF THE TREASURY

OFFICE OF TAX POLICY

AND

INTERNAL REVENUE SERVICE

2002 - 2003 PRIORITY GUIDANCE PLAN LIST

OCTOBER 31, 2002 UPDATE

CONSOLIDATED RETURNS

Original PGP Project Published:

3. Guidance under section 1502 and 337(d) regarding losses on member stock.
 - PUBLISHED 10/23/2002 in FR as REG-131478-02

CORPORATIONS AND THEIR SHAREHOLDERS

Original PGP Project Published:

1. Guidance regarding redemptions of corporate stock.
 - PUBLISHED 10/18/2002 in FR as NPRM REG-150313-01

EMPLOYEE BENEFITS

A. Retirement Benefits

Original PGP Projects Published:

1. Guidance under section 72(t) regarding substantially equal periodic payments.
 - PUBLISHED 10/21/2002 in IRB 2002-42 as REV. RUL. 2002-62
17. Guidance on disclosure to participants regarding their distributions from pension plans.

- PUBLISHED 10/7/2002 in FR as NPRM REG-124667-02

Additional Projects:

24. Revenue ruling modifying Rev. Rul. 2002-46 regarding grace period contributions to a section 401(k) plan and matching contributions to a qualified defined contribution plan.
 - WILL PUBLISH 11/12/2002 in IRB 2002-45 as REV. RUL. 2002-73
25. Revenue ruling on recovery of plan overpayment.
26. Revenue ruling under section 411 on taking frozen accruals into account.
27. Revenue procedure on statute of limitations under section 4971.
28. Revenue ruling on the effect of EGTRRA on the elimination of optional forms of benefit in defined contribution plans.
29. Guidance on the application of section 401(a)(4) for cash balance plans.
30. Notice on section 401(a)(9) effective date.

B. Executive Compensation, Health Care and Other Benefits, and Employment Taxes

Original PGP Project Published:

4. Guidance on whether accident and health plan reimbursements for medical expenses incurred before the inception of the plan are excludable from the recipient's gross income under section 105(b).
 - PUBLISHED 9/23/2002 in IRB 2002-38 as REV. RUL. 2002-58

Additional Projects:

18. Effective date of Rev. Proc. 2002-41.
 - PUBLISHED 9/9/2002 in IRB 2002-36 as NOTICE 2002-55
19. Revenue ruling under section 83 regarding payment for property with a note.
20. Announcement on leave donation programs.
21. Guidance under section 419A(f)(5) on the definition of collectively bargained agreement.
22. Notice on issues with respect to the tax treatment of choreworkers.
23. Withdrawal of proposed regulations under section 3321 regarding imposition of Railroad Unemployment Repayment Tax.

24. Revenue ruling on application of section 4980 to transfer of excess assets.
25. Revenue ruling on application of section 4980B in divorce situations.

EXCISE TAXES

Original PGP Projects Published:

1. Guidance under sections 4041 and 4081 regarding biodiesel.
 - WILL PUBLISH 11/18/2002 in IRB 2002-46 as REV. RUL. 2002-76
5. Guidance under section 4221 regarding fuel used in foreign trade.
 - PUBLISHED 8/12/2002 in IRB 2002-32 as REV. RUL. 2002-50
6. Guidance under section 4261(e)(3) regarding the purchase of the right to provide mileage awards.
 - PUBLISHED 10/7/2002 in IRB 2002-40 as NOTICE 2002-63

Additional Project:

8. Guidance under section 4261 regarding the sales of frequent flyer miles.
 - PUBLISHED 10/7/2002 in IRB 2002-40 as REV. RUL. 2002-60

EXEMPT ORGANIZATIONS

Original PGP Projects Published:

3. Guidance under section 501(c)(12).
 - PUBLISHED 9/16/2002 in IRB 2002-37 as REV. RUL. 2002-55
 - PUBLISHED 9/16/2002 in IRB 2002-37 as REV. RUL. 2002-54

Additional Projects:

8. Form 990 series developments and request for comments regarding proposed changes.
 - PUBLISHED 9/30/2002 in IRB 2002-39 as ANNOUNCEMENT 2002-87
9. Request for comments regarding application for recognition of exemption.
 - PUBLISHED 10/15/2002 in IRB 2002-41 as ANNOUNCEMENT 2002-92
10. Revenue procedure on annual filing requirements for organizations formed in U.S. possessions.
11. Revenue procedure regarding exclusion from income under section 115.
12. Revenue ruling on unrelated business income tax issues relating to retail sales.

FINANCIAL INSTITUTIONS AND PRODUCTS

Additional Projects:

12. Clarification of Notice 2001-10 and Notice 2002-8.
 - PUBLISHED 9/9/2002 in IRB 2002-36 as NOTICE 2002-59
13. Revenue ruling regarding the effect of collars on qualified covered calls status.
 - WILL PUBLISH 11/12/2002 in IRB 2002-45 as REV. RUL. 2002-66
14. Revenue ruling regarding hedges of debt instruments under section 1.446-4(e)(4).
 - WILL PUBLISH 11/4/2002 in IRB 2002-44 as REV. RUL. 2002-71
15. Revenue ruling regarding section 1259 re-established positions.

GENERAL TAX ISSUES

Original PGP Projects Published:

9. Guidance under section 42 regarding the Rent Supplemental Payment Program/Rental Assistance Payment Program.
 - PUBLISHED 10/28/2002 in IRB 2002-43 as REV. RUL. 2002-65
31. Final regulations under section 469 regarding self-charged interest.
 - PUBLISHED 8/21/2002 in FR as TD 9013

Additional Projects:

35. Guidance under section 45D regarding other federal tax benefits.
 - PUBLISHED 10/15/2002 in IRB 2002-41 as NOTICE 2002-64
36. Notice under section 121 regarding the reduced maximum exclusion of gain on the sale of a principal residence for taxpayers affected by the September 11, 2001, terrorist attacks.
 - PUBLISHED 9/9/2002 in IRB 2002-36 as NOTICE 2002-60
37. Revenue ruling on deductions under sections 162 and 163 in connection with lease-in, lease-out (LILO) transactions.
 - WILL PUBLISH 11/4/2002 in IRB 2002-44 as REV. RUL. 2002-69
38. Guidance on the tax treatment of payments made under USDA Peanut Quota Buyout Program.
 - PUBLISHED 10/21/2002 in IRB. 2002-42 as NOTICE 2002-67
39. Revenue ruling under section 1241 on cancellation of lease or distributor agreements.

40. Guidance regarding the election under section 1397B.
 - PUBLISHED 10/7/2002 in IRB 2002-40 as REV. PROC. 2002-62
41. Revenue ruling under sections 61, 102, and 139 regarding payments to victims of disasters.
42. Notice under sections 61 and 139 regarding payments to residents of lower Manhattan affected by the September 11, 2001, terrorist attacks.
43. Revenue ruling under section 1031 regarding the use of related parties as intermediaries in a purported like kind exchange.
44. Revenue ruling under section 168 regarding the depreciation of general assets owned by a utility.
45. Revenue procedure under section 1400I regarding the commercial revitalization deduction.

GIFTS, ESTATES AND TRUSTS

Original PGP Projects Published:

8. Guidance under sections 2033 and 2039 regarding New York City and New York State Accidental Death Benefits.
 - PUBLISHED 7/8/2002 in IRB 2002-27 as REV. RUL. 2002-29

Additional Projects:

13. Revenue ruling under section 2201, as amended by the Victims of Terrorism Relief Act of 2001, providing sample computations of the estate tax.
14. Revenue ruling under section 2042 regarding the taxation of life insurance of Louisiana decedents.

INSURANCE COMPANIES AND PRODUCTS

Additional Projects:

5. Revenue ruling regarding the aggregation of annuity contracts.
 - WILL PUBLISH 11/12/2002 in IRB 2002-45 as REV. RUL, 2002-75
6. Revenue ruling regarding viatical settlement company licensing requirement.
7. Revenue procedure regarding composite method for loss reserve discounting.
8. Notice regarding treatment of certain re-insurance transactions
 - WILL PUBLISH 11/4/2002 in IRB 2002-44 as NOTICE 2002-70.

INTERNATIONAL ISSUES

B. Inbound Transactions

Original PGP Projects Published:

2. Guidance under section 1441.
 - PUBLISHED 9/3/2002 in IRB 2002-35 as REV. PROC. 2002-55
 - PUBLISHED 10/21/2002 in IRB 2002-42 as NOTICE 2002-66

G. Other

Original PGP Project Published:

1. Guidance on the taxation of foreign insurance companies.
 - PUBLISHED 10/28/2002 in IRB 2002-43 as NOTICE 2002-69

Additional Project:

5. Proposed regulations regarding partner filing requirements for controlled foreign partnerships under section 6038

PARTNERSHIPS

Original PGP Projects Published:

5. Guidance on synthetic tax-exempt bonds.
 - PUBLISHED 10/28/2002 in IRB 2002-43 as REV. PROC. 2002-68
10. Guidance regarding entity classification and community property owners.
 - WILL PUBLISH 11/12/2002 in IRB 2002-45 as REV. PROC. 2002-69
11. Guidance under section 7701 regarding late check-the-box elections.
 - PUBLISHED 9/30/2002 in IRB 2002-39 as REV. PROC. 2002-59

SUBCHAPTER S

Additional Project:

5. Revenue ruling under section 1361 regarding QSUB elections.

TAX ACCOUNTING

Original PGP Projects Published:

1. Guidance regarding the treatment of costs incurred for railroad track maintenance.

- PUBLISHED 10/15/2002 in IRB 2002-41 as REV. PROC. 2002-65
7. Revenue procedure under section 446 to clarify procedures applicable to voluntary changes in methods of accounting.
 - PUBLISHED 9/3/2002 in IRB 2002-35 as REV. PROC. 2002-54
 14. Final regulations under section 471 regarding the unit livestock price method of accounting.
 - PUBLISHED 10/28/2002 in FR as TD 9019

Additional Project:

17. Guidance amplifying and clarifying revenue procedures under section 442 regarding changes in annual accounting period.
 - WILL PUBLISH 11/18/2002 in IRB 2002-46 as NOTICE 2002-72

TAX ADMINISTRATION

Original PGP Projects Published:

8. Guidance under section 6011 regarding the disclosure of certain large transactions.
 - PUBLISHED 10/22/2002 in FR as TD 9017
10. Guidance under section 6111 regarding corporate tax shelter registration.
 - PUBLISHED 10/22/2002 in FR as TD 9017
11. Guidance under section 6112 regarding list of tax shelter investors.
 - PUBLISHED 10/22/2002 in FR as TD 9018
30. Final regulations regarding offers-in-compromise.
 - PUBLISHED 7/23/2002 in FR as TD 9007
43. Guidance under section 301.9100-1 on the extension of time to make elections.
 - PUBLISHED 9/3/2002 in IRB 2002-35 as NOTICE 2002-58

Additional Projects:

45. Notice under section 1363 regarding the effect of an S corporation election.
46. Proposed regulations under various provisions regarding adjustments under section 481(a) for changes in accounting method.
47. Guidance regarding tax shelter transactions involving a straddle, a tiered partnership, a transitory partner, and the absence of a section 754 election.
 - PUBLISHED 7/15/2002 in IRB 2002-28 as NOTICE 2002-50

48. Guidance regarding tax shelter transactions involving S corporation/ partnership straddles.
 - PUBLISHED 10/15/2002 in IRB 2002-41 as NOTICE 2002-65
49. Revenue procedure prescribing procedures for voluntarily participating in a settlement initiative aimed at resolving cases involving Notice 2001-17 contingent liability transactions.
 - PUBLISHED 10/28/2002 in IRB 2002-43 as REV. PROC. 2002-67
50. Announcement prescribing procedures for voluntarily participating in a settlement initiative aimed at resolving cases involving Notice 2001-45 basis shifting transactions.
 - PUBLISHED 10/28/2002 in IRB 2002-43 as ANNOUNCEMENT 2002-97
51. Announcement prescribing procedures for voluntarily participating in a settlement initiative aimed at resolving cases involving corporate-owned life insurance (COLI) transactions.
 - PUBLISHED 10/28/2002 in IRB 2002-43 as ANNOUNCEMENT 2002-96
52. Revenue procedure regarding the reporting requirements under section 6050I for taxi cab drivers and fleet owners relating to lease payments aggregating in excess of \$10,000.
53. Regulations under section 6109 allowing income tax return preparers to elect an alternative to their social security number for purposes of identifying themselves on returns that they prepare.
 - PUBLISHED 8/14/2002 in FR as TD 9014
54. Regulations under section 7602 regarding the designation of IRS officers or employees to take summoned testimony or receive summoned information.
 - PUBLISHED 9/9/2002 in FR as TD 9015

TAX EXEMPT BONDS

Original PGP Projects Published:

3. Final regulations under section 141 regarding output facilities.
 - PUBLISHED 9/23/2002 in FR as TD 9016
4. Notice under section 141 regarding allocation and accounting rules for output facilities.
 - PUBLISHED 9/23/2002 in FR as ANPRM REG-142599-02
8. Guidance on procedures for requesting an extension of time to file information returns required by section 149(e).
 - PUBLISHED 9/16/2002 in IRB 2002-37 as REV. PROC. 2002-48

Additional Projects:

11. Qualified public educational facility bonds - 2002 calendar year resident population.
 - PUBLISHED 8/12/2002 in IRB 2002-32 as NOTICE 2002-56

12. Guidance under section 146.